

1 **KING & SPALDING LLP**  
2 QUYEN L. TA (SBN 229956)  
3 50 California Street, Suite 3300  
4 San Francisco, CA 94111  
5 Email: [qta@kslaw.com](mailto:qta@kslaw.com)  
Telephone: (415) 318-1200  
Facsimile: (415) 318-1300

6 ALVIN LEE (*pro hac vice* forthcoming)  
7 1185 Avenue of the Americas  
8 34th Floor  
9 New York, NY 10036-2601  
Email: [alvin.lee@kslaw.com](mailto:alvin.lee@kslaw.com)  
Telephone: (212) 556-2100  
Facsimile: (212) 556-2222

10  
11 *Attorneys for Defendant*  
12 DISCORD INC.

13  
14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 ZHEA ZHEA ZARECOR AS PERSONAL  
18 REPRESENTATIVE OF ZHEA ZARECOR  
19 SALAZAR, individually and on behalf of all  
others similarly situated,

20 Plaintiff,

21 v.

22 DISCORD INC.,

23 Defendant.

24 Case No. 3:23-cv-05385-JSC

**THIRD STIPULATION TO EXTEND TIME  
TO RESPOND TO COMPLAINT (L.R. 6-1)**

Complaint Filed: October 20, 2023  
Complaint Served: November 29, 2023  
Current Response Date: February 19, 2024  
New Response Date: March 4, 2024

**CLASS ACTION**

1 Plaintiff Zhea Zarecor as Personal Representative of Zhea Zarecor Salazar (“Plaintiff  
2 Zarecor”) and Defendant Discord Inc. (“Discord”), pursuant to Local Rule 6-1, hereby stipulate to the  
3 following extension of time for Discord to respond to the Complaint:

4 **WHEREAS**, on October 20, 2023, Plaintiff Zarecor filed her Complaint alleging, on behalf of  
5 herself as personal representative of Zhea Zarecor Salazar and a proposed nationwide class, violations  
6 of California’s Unfair Competition Law (Cal. Bus. & Prof. Code § 17200, et seq.), violations of  
7 California’s Consumer Legal Remedies Act (“CLRA”) (Cal. Civ. Code § 1750, et seq.), violations of  
8 California Business and Professional Code §§ 17500, et seq., violations of Texas’ Deceptive Trade  
9 Practices-Consumer Protection Act (“DTPA”), and unjust enrichment by Discord;

10 **WHEREAS**, on November 29, 2023, Plaintiff Zarecor served her Complaint on Discord;

11 **WHEREAS**, pursuant to Rule 12(a)(1) of the Federal Rules of Civil Procedure, Discord’s  
12 response to the Complaint was due on December 20, 2023;

13 **WHEREAS**, Discord conferred with Plaintiff’s counsel and requested that Plaintiff agree to  
14 extend the time for Discord to respond to the Complaint to January 19, 2024 (a 30-day extension);

15 **WHEREAS**, Plaintiff agreed to Discord’s request to extend the time for Discord to respond to  
16 the Complaint to January 19, 2024;

17 **WHEREAS**, on December 19, 2023, Discord filed a joint stipulation to extend the time for it  
18 to respond to the Complaint to January 19, 2024 (Dkt. No. 9);

19 **WHEREAS**, Discord conferred with Plaintiff’s counsel and requested that Plaintiff agree to  
20 extend the time for Discord to respond to the Complaint to February 19, 2024 (a 31-day extension);

21 **WHEREAS**, Plaintiff agreed to Discord’s request to extend the time for Discord to respond to  
22 the Complaint to February 19, 2024;

23 **WHEREAS**, on January 17, 2023, Discord filed a second joint stipulation to extend the time  
24 for it to respond to the Complaint to February 19, 2024 (Dkt. No. 20);

25 **WHEREAS**, the parties are engaged in discussions regarding the possibility of an early  
26 resolution of this matter, and Discord has conferred with Plaintiff’s counsel and requested that Plaintiff  
27 agree to extend the time for Discord to respond to the Complaint to March 4, 2024 (a 14-day extension)  
28 in order to facilitate such preliminary discussions;

1           **WHEREAS**, Plaintiff agreed to Discord's request to extend the time for Discord to respond to  
2 the Complaint to March 4, 2024;

3           **WHEREAS** the requested extension will not affect any dates set by the court; and

4           **WHEREAS**, this is the third stipulation by the parties for an extension of time for Discord to  
5 respond to the Complaint.

6           **IT IS HEREBY STIPULATED** by and between the parties that Discord's date to respond to  
7 the Complaint, by answer, motion, or otherwise, is extended to and including **March 4, 2024**.

8

9           Dated: February 20, 2024

**KALIELGOLD PLLC**

10

11           By: /s/ Sophia G. Gold

12           JEFFREY D. KALIEL  
13           SOPHIA G. GOLD  
14           SCOTT EDELSBERG

15

16           Attorneys for Plaintiff

17

18           Dated: February 20, 2024

**KING & SPALDING LLP**

19

20           By: /s/ Quyen L. Ta

21           QUYEN L. TA  
22           ALVIN LEE

23

24           Attorneys for Defendant  
25           DISCORD INC.

26

27           **L.R. 5-1 ATTESTATION**

28

29           I, Quyen L. Ta, attest that all signatories listed herein, and on whose behalf this filing is  
30 submitted, concur in this filing's content and have authorized this filing.

31

32           By: /s/Quyen L. Ta

33           QUYEN L. TA